ID: CCA\_2009042910293220 Number: **200922053** Release Date: 5/29/2009

Office:

UILC: 6334.00-00, 6323.00-00

From:

**Sent:** Wednesday, April 29, 2009 10:29:34 AM

To: Cc:

Subject: RE: SITLP - MN Claimant Info

Section 6334 lists property that is exempt from levy. The following are some items that are exempt from levy: wearing apparel and school books; fuel, provisions, furniture, and personal effects up to a certain amount; workmen's compensation, judgments for support of minor children; and other similar types of items. There are also superpriorities - where an interest has priority over the federal tax lien regardless of when (in time) such interest arose. The below text is from a training manual. Please let me know if you have any questions.

Thanks,

## SUPERPRIORITIES - I.R.C. ' 6323(b)

A A superpriority is an interest having priority over the federal tax lien regardless of when (in time) such interest arose.

## B Interest Classification

- Securities.
- 2. Motor vehicles.
- 3. Personal property purchased at retail.
- 4. Personal property purchased in casual sale.
- 5. Personal property subject to possessory lien.
- Real property tax and special assessment liens.
- 7. Residential property subject to mechanic's lien for repairs and improvements.
- 8. Attorney's liens.
- 9. Insurance contracts.
- 10. Deposit-secured loans.